

IN THE UNITED STATES DISTRICT COURT
Northern District of Ohio Eastern Division

TRACEY CAYLOR et al.,

Plaintiff,

vs.

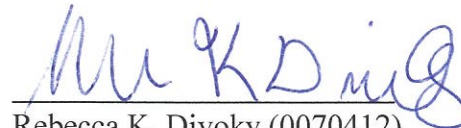
ASHTABULA COUNTY dba
ASHTABULA COUNTY NURSING &
REHABILITATION CENTER

Case No. 1:19-cv-2628

Motion for Extension of Time

Now comes the Defendant, the Ashtabula County Nursing and Rehabilitation Center, by and through their Counsel, Rebecca K. Divoky, Assistant Prosecutor to Nicholas A. Iarocci, the duly elected and acting Prosecuting Attorney for Ashtabula County, Ohio, and moves this Honorable Court for an extension of time of Sixty (60) days, until January 20, 2020, to file an answer to Plaintiff's Class Action Compliant with Jury Demand. This is the first extension of time requested by Defendant and is not being made for purposes of delay. This extension of time is needed to obtain specialized outside counsel.

Respectfully submitted,



Rebecca K. Divoky (0070412)

Assistant Prosecutor

NICHOLAS A. IAROCCI (0042729)

PROSECUTING ATTORNEY

25 West Jefferson Street

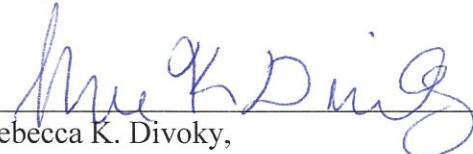
Jefferson, Ohio 44047

(440) 576-3662, fax (440) 576-3600

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CERTIFICATE OF SERVICE

A copy of the foregoing Motion for Extension of Time was delivered by U.S. mail, postage prepaid, this 27th day of November 2019, to, Kristen M. Kraus, counsel for Plaintiffs, at Dworken & Bernstein Co., L.P.A., 60 South Park Place, Painesville, Ohio 44077.



Rebecca K. Divoky,
Assistant Prosecuting Attorney